

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FAYETTEVILLE DIVISION

RAY WESLEY DEEVER, JR.

PLAINTIFF

v.

Civil No. 07-5116

CAPTAIN HUNTER PETRAY;  
DEPUTY CLARK; and  
DEPUTY VANETTA

DEFENDANTS

**ORDER**

Defendants filed a motion for summary judgment (Doc. 16). To assist plaintiff in responding to the motion for summary judgment, the undersigned is propounding a questionnaire. The court will consider plaintiff's response to the questionnaire in issuing a report and recommendation on the motion for summary judgment.

For this reason, Ray Deaver is hereby directed to complete, sign, and return the attached response to defendants' motion for summary judgment on or before **August 11, 2008**. **Plaintiff's failure to respond within the required period of time may subject this matter to dismissal for failure to comply with a court order.**

IT IS SO ORDERED this 18th day of July 2008.

/s/ J. Marschewski

HON. JAMES R. MARSCHEWSKI  
UNITED STATES MAGISTRATE JUDGE

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FAYETTEVILLE DIVISION

RAY WESLEY DEEVER, JR.

PLAINTIFF

v.

Civil No. 07-5116

CAPTAIN HUNTER PETRAY;  
DEPUTY CLARK; and  
DEPUTY VANETTA

DEFENDANTS

**RESPONSE TO SUMMARY JUDGMENT MOTION**

TO: RAY DEEVER

These questions and answers will serve as your response to defendants' motion for summary judgment. You may use additional sheets of paper in responding to these questions.

You must file this response by **August 11, 2008**.

1(A). You were booked into the Benton County Detention Center (BCDC) on August 9, 2006, on residential burglary, theft of property, and failure to appear charges.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 1 at pages 1 and 2.

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(B). You remained incarcerated until October 27, 2006.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 1 at page  
1.

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(C). You were booked into the BCDC again on March 22, 2007, on probation  
violation charges.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 1 at page  
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(D). You remained incarcerated there until March 24, 2007.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 1 at page  
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(E). You were booked into the BCDC again on May 10, 2007, on probation violation charges.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 1 at page 7.

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(F). You were released on May 14, 2007.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 1 at page 7.

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(G). You were booked back into the BCDC on May 25, 2007, on a probation violation charge and possession of drug paraphernalia charges.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 1 at page 10.

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(H). You remained incarcerated at the BCDC until September 4, 2007.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 1 at page 10.

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2. Hunter Petray was employed by the BCDC as a Captain from August of 2006 until September of 2007.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 5 at ¶ 1.

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3. Petray was employed as a Captain during all times you were incarcerated at the BCDC.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 5 at ¶ 2.

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4. It is the policy and practice of the BCDC to check and record inmates' dietary requirements during booking.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 5 at ¶ 3.

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5. An inmate of the BCDC receives a vegetarian tray only if health or religious reasons are disclosed by the inmate during booking.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to the Defendants' Exhibit 5 at ¶

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6. The BCDC does not normally give an inmate a vegetarian tray if the inmate has not disclosed a health or religious reason for receiving a vegetarian tray during booking.

Inmates are not permitted to receive a vegetarian tray based on mere preference.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 5 at ¶ 5.

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7. Although you did not disclosed a health or religious reason for receiving a vegetarian tray during your booking on August 9, 2006, you began receiving a vegetarian tray on September 6, 2006, because you alleged the normal tray you were receiving made you ill.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 5 at ¶ 6.

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8. You did not disclose any health or religious reason for receiving a vegetarian tray during booking on March 22, 2007, and therefore did not receive a vegetarian tray upon your request.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 5 at ¶ 7.

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9. When you were booked in on May 10, 2007, you indicated to jail staff during booking that you were vegetarian and lactose intolerant.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 5 at ¶ 8.

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10. On May 27, 2007, when you complained that you were sick and needed a vegetarian tray one was authorized.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 5 at ¶ 9.

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11. On August 18, 2007, you complained the cheese on the vegetarian tray was making you sick. Jail personnel told you that cheese was a part of the vegetarian tray and you could elect to eat it or not.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 5 at ¶ 10.

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12. You received a vegetarian tray during each incarceration when you disclosed a health or religious reason for receiving a vegetarian tray during booking.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 5 at ¶ 11.

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13. You also received a vegetarian tray during your first incarceration even though you did not disclose a health or religious reason for receiving a vegetarian tray during

booking.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 5 at ¶ 11.

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14. When you were booked in on August 9, 2006. You completed a medical questionnaire. You did not indicate you were on a special diet or were a vegetarian.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain.

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15(A). On August 11th Deputy Undiano was handing out whites to inmates in holding cell two. You had three white tee-shirts and two pairs of socks. Undiano asked you why you had extra whites. You responded you didn't know. Your extra whites were confiscated and you were locked down for having extra whites.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page 1.

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(B). You received a disciplinary for concealing items from jail staff. You had a disciplinary hearing and were found guilty and given five days lock-down and loss of privileges.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 2.

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(C). You appealed and the decision was upheld.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 2.

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16. You made your first request for a vegetarian diet when you submitted a medical request on August 18th. You stated you had been incarcerated for a little over a week and were a vegetarian. You stated you were only eating bread and what wasn't meat. You indicated you had been a vegetarian for two and a half years and didn't believe you were getting the nutrients you needed.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page 1.

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17. In response, Petray stated you would remain on your same diet.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page 1.

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18. What day did you start receiving a vegetarian tray? (Was it September 6th?).

Answer:

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19(A). On September 1st Deputy Clark was assigned to booking. Sgt. Faulkenbury instructed the deputies to inform the juvenile inmates, including you, during "power shift" not to stand at the window and lay down. All juvenile inmates were told this was their first and only warning or they would be locked down.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 3.

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(B). A short time later, Clark observed you and two other juvenile inmates standing at the window. All three of you were put on lock-down for disobeying the order of a deputy.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 3.

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(C). You were given a disciplinary hearing, found guilty, and given ten days lock-down and loss of privileges.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 4.

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(D). You appealed and the decision was modified to run with the lock-down on September 4th.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 4.

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20(A). On September 2nd you submitted a grievance. You stated you were getting a vegetarian tray but were supposed to get peanut butter for lunch and dinner. You indicated it

was already approved. You said the cheese made you sick.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page 2.

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(B). In response you were told you asked for vegetarian trays and were getting them.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page 2.

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21(A). On September 4th Deputy Echols called over the speaker into B-180 for all inmates, including you, to close your doors. Since you were already on lock-down you were told to get in your cell and shut your door.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 5.

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(B). You were sitting at the day-room table. Echols again ordered you back to your cell and shut your door. She told you that you were being locked down for refusing an order of a deputy.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 5.

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(C). You were given a disciplinary for refusing to obey the order of a deputy.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 6.

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(D). You were given a hearing, found guilty, and given ten days lock-down with loss of privileges.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 6.

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(E). You appealed and the decision was modified to two days.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 6.

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22. On September 4th you submitted a grievance that you had been put on lock down for having your door open when it was closed. You also stated you did not receive recreation although the books said you received it.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page

3.

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23. In response, Major Drake stated the control panel was checked and operated properly. He stated the light indicator showed your door was open. He stated you have and would receive recreation.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page

3.

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24(A). On September 30th you complained that you hadn't received recreation for the third time that week. You indicated that also meant you were not getting your shower or the opportunity to read the paper.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page

4.

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(B). The back side of your grievance is not contained in the exhibit. You apparently also complained about your use of the phone. Please state what the problem was with your use of the phone.

Answer:

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(C). In response, Petray stated he had checked your phone records and you were being allowed to use the phone. He stated you had attempted thirty-two phone calls last week. He indicated he would check on the other matters.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page 4.

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(D). After your grievance did you receive an opportunity for recreation, showers, and



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25. On October 10th you submitted a request stating you needed to talk to the Boone County Public Defender. You also stated you needed to look at a warrant that came in from Boone County. In response you were told they did not have the address for the Boone County Public Defender's Office but the warrant was for residential burglary, theft of property and criminal mischief.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to the Defendants' Exhibit 4 at page 5.

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26. On October 10th you submitted a grievance. You stated you had not gotten

recreation for "like 3 days." Also twice that week you stated that the staff only popped your door for recreation and didn't wake you up. You said you had a sleep disorder and when you were asleep you were knocked out. You complained that you were not receiving proper sanitation, hygiene, or exercise.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page 6.

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27. In response, Petray stated that cleaning supplies are given to you to clean your room. He stated it was your responsibility to clean. He stated they called recreation and it was not their job to wake you up. He told you that you could file whatever paperwork you wanted.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page 6.

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28. During your incarceration at the BCDC from March 22, 2007, to March 27, 2007, did you receive a vegetarian tray for any meals?

Answer: Yes \_\_\_\_\_ No \_\_\_\_\_.

If you answered yes, please state how many meals you received a vegetarian tray for.

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29. On May 27, 2007, you submitted a medical request stating you were a vegetarian and were not getting your special tray. You indicated that for the past the three or four days you had only been eating breakfast. You asked if someone could get this fixed before you got sick.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page 7.

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30. In response, a vegetarian tray was ordered by Nurse Garrett on May 30th.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2 at page

1.

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31. On June 10th you submitted a grievance in which you complained that the toothpaste you received was expired. You stated that when you finished brushing your teeth your felt sick. You indicated you had to quit brushing your teeth because of this.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page

8.

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32. In response, Petray stated there was nothing wrong with the toothpaste that was passed out there.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page

8.

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33. On June 23rd Deputy Hernandez was passing out medication. He opened the door to D-153. You walked from D-153 to D-150 and were looking into the pod. Hernandez asked you to come and get your medication and let you know there should be no reason for you to look into any other pod.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 7.

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34. You responded: "What I do to the black guy I'm going to do to you."

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 7.

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35. Hernandez walked down pod control and told you that if you came out to get

medication not to come out and run your mouth. You moved forward towards Hernandez and asked if he was going to kiss him to.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 7.

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36. Hernandez placed you on the floor and he and Adams handcuffed you. Hernandez advised you to get to your knees and face the wall. Hernandez again advised you that when you came out to get medication you needed to follow orders and not talk back.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 7.

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37. You were escorted back into the pod and advised to go to your cell and gather your belongings because you were being locked down.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 7.

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38. You were charged with a disciplinary for refusing to obey the order of a deputy.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 9.

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39. You were given a hearing, found guilty, and given ten days lock-down and loss of privileges.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 9.

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40. You appealed the decision and it was upheld.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 9.

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41. On August 7th Deputy Stival told all inmates, including you, in D-130 to clean their cells and when finished to close their cell doors and go back into the day room.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 10.

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42. Stival inspected the panel and noticed cell doors that were still open. He inspected the cells with open doors and closed the doors while doing so. He saw you in your cell sleeping. As Stival walked into your cell, you woke up and began to walk out.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 10.

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43. Stival instructed you to grab all your belongings and go out to D pod control. He told you that you were being locked down for disobeying the order of a deputy.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 10.

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44. On August 18th, Deputy Simmons was in E-103 cell 130 doing cell checks when he came across twenty-eight pieces of yellow paper. You stated the paper belonged to you. Simmons informed you that you were going to be locked down for concealing items from jail staff.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 11.

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45(A). You were given a disciplinary, found guilty, and given ten days lock down and loss of privileges.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 13.

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(B). You appealed the decision and the lock-down was modified to five days.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3 at page 13.

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46. On August 18th you complained that for dinner you got cheese. You stated there

was no way you got 2300 calories that day. Additionally you said you could not eat the cheese because it made you sick. You stated for them to ask the Sheriff about the juvenile last year and he would tell them he didn't get cheese. You stated the Sheriff was the one that made sure you didn't get cheese.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page 9.

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47. In response, you were told you were on a vegetarian diet and the kitchen put cheese on the trays instead of meat.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4 at page 9.

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48. Deputy Clark locked you down on one occasion on September 1, 2006. Is this lock-down how you believe he violated your federal constitutional rights?

Answer: Yes \_\_\_\_\_ No \_\_\_\_\_.

If you answered yes, please explain in detail how you believe this lock-down violated your federal constitutional rights in view of the fact that you received a disciplinary hearing and appealed the hearing decision.

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If you answered no, please explain in detail how you believe Clark violated your federal constitutional rights.

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Answer: Yes \_\_\_\_\_ No \_\_\_\_\_.

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53. Please state: (a) if you were able to send and receive personal mail; (b) if you were able to send and receive legal mail; (c) if you had access to a phone; (d) if you had an attorney representing you on your criminal charges; (e) did you have access to books or magazines; (f) did you have access to radio or news broadcasts; and (g) did you have access to newspapers.

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55. Please state in detail how you believe Petray violated your federal constitutional rights.

Answer:

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Answer: Yes \_\_\_\_\_ No \_\_\_\_\_.

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I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS  
TRUE AND CORRECT.

EXECUTED ON THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 2008.

\_\_\_\_\_  
RAY DEAVER